AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas
FILED

APR 2 1 2021

Nathan Ochsner, Clerk

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America	)	
v.	)	
	)	Case No.
Fidel Angel Lainez Jr.	)	M-21-0846 -M
	)	
	)	
	)	
Defendant(s)	)	

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ April 20, 2021 _____ in the county of _____ Hidalgo _____ in the

_____ Southern _____ District of _____ Texas _____ , the defendant(s) violated:

Code Section	Offense Description
21 United States Code § 952	Defendant did knowingly and intentionally import from the United Mexican States into the United States approximately 8.08 kilograms of methamphetamine, a Schedule II controlled substance, and 157 grams of heroin; a Schedule I controlled substance.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

☑ Continued on the attached sheet.

Sworn to and executed by reliable electronic means, and attested telephonically per Fed. R. Cr. 4.1, and probable cause found on:

Hiram Almaguer
Complainant's signature

Approved by AUSA L. Fry

Hiram Almaguer, Special Agent, HSI
Printed name and title

Date: 4/21/2021 2:21pm

Judge's signature

City and state: _____ McAllen, TX _____

Nadia Medrano, US Magistrate Judge
Printed name and title

Attachment "A"

On April 20, 2021, Homeland Security Investigations (HSI), McAllen, Texas, was notified by United States Customs and Border Protection (CBP) that Fidel Angel Lainez Jr. made entry into the United States via the Hidalgo TX Port of Entry in Hidalgo, Texas. LAINEZ was the driver, registered owner, and sole occupant of a Volkswagen Toureg. LAINEZ presented himself to CBP with a questionable travel itinerary and with nervous demeanor - being overly talkative, interrupting the CBP Officer, and commenting on weather. LAINEZ was referred to secondary for further inspection.

LAINEZ told the CBP Officers at secondary inspection that he had traveled to Reynosa, Tamaulipas from Houston, Texas in order to have dental work done. LAINEZ displayed his teeth. LAINEZ further stated he has had the vehicle for four weeks and declared all the contents within the vehicle were his. LAINEZ continued to display nervous behavior, as he did at primary inspection.

CBP Officers scanned the vehicle through the use of a Z-Portal X-Ray and noticed an anomaly under the driver's side seat of the vehicle. CBP Officers then utilized a narcotic detecting canine, which positively alerted to the undercarriage of the vehicle. CBP Officers utilized a lift to examine the undercarriage of the vehicle and noticed significant tampering with the drivetrain of the vehicle. Officers probed the drivetrain and discovered a substance testing positive for the characteristics of methamphetamine.

A physical search of the drivetrain was conducted and multiple cellophane and metallic shurtape wrapped packages were discovered. Field testing of the contents of the packages tested positive for the characteristics of methamphetamine, with a total weight of 8.08 kilograms. Additional packages, weighing 123 grams, were located in a cylindrical tube component of the drive train, and the substance contained within those packages tested positive for the characteristics of heroin.

A HSI Special Agent and a CBP Officer spoke with LAINEZ, who looked to be in a state of confusion when being asked biographical questions. LAINEZ was asked about his home address, which he provided. He was then asked about the registered address of his vehicle, which was a different address than the one he had just provided. LAINEZ stated that the registered address of the vehicle was his friend's address, as he did not want the vehicle associated with his father's residence.

LAINEZ requested a cigarette and the opportunity to make a few phone calls. He was offered water and asked if he was ok. LAINEZ stated he was not okay. LAINEZ was read his Miranda Warnings which he invoked. Questioning ceased immediately.